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10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14
15 UNITED STATES OF AMERICA,) No. 3-06-70408 MEJ
16 Plaintiff,)
17 v.)
18 TONY J. DANILLOO,) [PROPOSED] ORDER EXTENDING TIME
19 Defendant.) FOR PRELIMINARY EXAMINATION
20 _____)

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22 This matter was set for preliminary hearing (or arraignment) on August 23, 2006. On
23 August 23, 2006, by letter to the Court, the parties jointly removed the matter from calendar.
24 The parties now jointly request that the matter be reset for September 1, 2006.

25 The parties further stipulate and agree that the defendant has previously, in open court,
26 made a knowing and voluntary waiver of his rights to a preliminary hearing within ten days of his
27 initial appearance and to an indictment or information within thirty days of his arrest. The
28 parties jointly request the Court to extend the ten-day time limit for preliminary

1 examination under Federal Rule of Criminal Procedure 5, and the thirty-day time limit for
2 information or indictment under 18 U.S.C. § 3161(b), from August 23, 2006, to
3 September 1, 2006.

4 Respectfully submitted,

5 KEVIN V. RYAN
United States Attorney

7 Date: August 31, 2006

/S/ Michael L. Wang
MICHAEL LI-MING WANG
Assistant United States Attorney

9 Date: August 31, 2006

/S/ Deborah Levine
DEBORAH LEVINE
Counsel for Defendant Tony J. Daniloo

12 [PROPOSED] ORDER

13 Upon stipulation of the parties, and good cause appearing, IT IS ORDERED that this
14 matter be continued from August 23, 2006, to September 1, 2006. IT IS FURTHER ORDERED,
15 based upon the stipulation of the parties and the Court's previous findings in open court, that the
16 ten-day time limit for preliminary examination under Federal Rule of Criminal Procedure 5, and
17 the thirty-day time limit for information or indictment under 18 U.S.C. § 3161(b), be extended
18 from August 23, 2006, to September 1, 2006. The Court specifically finds that the ends
19 of justice served by granting the requested continuance outweigh the best interest of the
20 public and the defendant in a speedy trial and in the prompt disposition of criminal cases.

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22 DATED: Aug. 31, 2006

